

EXHIBIT 2

In the Matter Of:

In re 568 President's Group

CHRISTOPHER WATSON

May 06, 2022



1
2 UNITED STATES DEPARTMENT OF JUSTICE

3 ANTITRUST DIVISION

4 -----X

5 In re:

6 568 PRESIDENT'S GROUP.

CID NO.
30956

7 -----X

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10 30 (b) (6) DEPOSITION

11 OF

12 NORTHWESTERN UNIVERSITY

13 BY

14 CHRISTOPHER WATSON

15 Friday, May 6, 2022

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21 Reported by:
22 AYLETTE GONZALEZ, RPR, CLR, CCR
23 JOB NO. 2022-842042
24
25

1 CHRISTOPHER WATSON (5/6/22)

2 Q. What information does the list
3 contain?

4 A. I would have the -- could --
5 the standard -- standard information that's
6 available for every applicant, so
7 obviously, the name, the -- what -- so what
8 he provides to -- what is he providing to
9 me is just the name and I would go look up
10 the applicant if that's what you mean.

11 Q. That is, thank you.

12 A. Okay.

13 Q. So just to clarify, the list
14 that the president sends to you is a list
15 of the applicant's names and nothing else;
16 is that correct?

17 A. Right.

18 Q. Do you discuss with him every
19 applicant on the list?

20 A. No.

21 Q. How is it decided which of the
22 names on the list are discussed?

23 A. I don't know. He would know
24 which names he'd want to discuss and I
25 don't know why they might be a priority

1 CHRISTOPHER WATSON (5/6/22)

2 NU here to refer to Northwestern

3 University?

4 A. Yes.

5 Q. "Yes."

6 Do you have any reason to doubt
7 the pool of applications that President
8 Schapiro reviews, contains legacy
9 applicants as well as children whose family
10 members have donated?

11 A. No, no reason to doubt it.

12 Q. Do you ever discuss with
13 President Schapiro whether an applicant has
14 donated to Northwestern?

15 A. No, I'm not given -- well, I'm
16 not given information on anyone's donation
17 history or potential donation. History of
18 donation may come up, but I'm not ever
19 given an amount. Again, there's kind of a
20 firewall between -- there is a firewall
21 between the admissions and the office of
22 alumni relations and development in that
23 way.

24 Q. How might information about
25 history of donation come up?